## **BAKER & HOSTETLER LLP**

45 Rockefeller Plaza

New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Dean D. Hunt

Email: dhunt@bakerlaw.com

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF GLADYS CASH; and CYNTHIA J. GARDSTEIN, in her individual capacity and in her capacity as Personal Representative of the Estate of Gladys Cash,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

**SIPA** Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04901 (SMB)

## FOURTH AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. Fact Discovery shall be completed by: July 31, 2015
- 2. The Disclosure of Case-in-Chief Experts shall be due: September 28, 2015
- 3. The Disclosure of Rebuttal Experts shall be due: October 28, 2015
- 4. The Deadline for Completion of Expert Discovery shall be: January 26, 2016
- 5. The Deadline for Mediation Referral shall be: March 25, 2016
- 6. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: April 8, 2016
- 7. The Deadline for Conclusion of Mediation shall be: August 8, 2016

Dated: New York, New York

June 19, 2015

Of Counsel:

## **BAKER HOSTETLER LLP**

811 Main, Suite 1100 Houston, TX 77002

Telephone: (713) 751-1600 Facsimile: (713) 751-1717

Dean D. Hunt

Email: dhunt@bakerlaw.com

**BAKER & HOSTETLER LLP** 

By: /s/ Nicholas J. Cremona

45 Rockefeller Plaza New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard

L. Madoff